

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE
OF MEDICINE, a foreign corporation,

Plaintiff,

United States District Court Judge
Patrick J. Duggan, presiding
Michael Hluchaniuk, referral
Case No.: 2:10-cv-10978

V

STEVEN L. WOODWARD,

Defendant.

Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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**PLAINTIFF'S RESPONSE TO "DEFENSE RESPONSE TO ORDER REQUIRING
RESPONSE TO DEFENDANT'S MOTION TO COMPEL" (Docket No. 135)**

Plaintiff American University of Antigua College of Medicine ("AUA") states its response to Defendant's Motion "DEFENSE RESPONSE TO ORDER REQUIRING RESPONSE TO DEFENDANT'S MOTION TO COMPEL" (Docket No. 135) as follows:

1. Defendant's response to this Court's order is frivolous.
2. Plaintiff responded to Defendant's Motion to Compel on April 11, 2011 and served this response on Defendant. (Docket No. 134).

3. For the reasons Plaintiff will discuss in its response to Woodward's Motion for Sanctions (Docket No. 136) the substance of Defendant's arguments are wholly without merit¹.

4. Since the relief sought in the instant filing is entirely duplicative of Docket No. 136, the instant filing should be denied as moot.

5. If the Court were to construe Defendant's filing as Objections pursuant to Fed. R. Civ. P. 72, the instant motion must be denied as he fails to present any grounds to demonstrate that the order is "clearly erroneous or is contrary to law."

6. Nothing is clearly erroneous or contrary to law about the Court ordering that a party respond to a motion.

7. Plaintiff requests that the Court sanction Defendant for filing this redundant pleading, enter an award of costs and require that henceforth Defendant pay \$20 to the Court Clerk upon filing of any motion.

Respectfully submitted,

/s/ Eric A. Buikema (P58379)
Eric A. Buikema (P58379)
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Dated: May 4, 2011

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Plaintiff's Response to "Defense Response to Order Requiring Response to Defendant's Motion to Compel" (Docket No.1 35), Brief in Support and this Certificate of Service were served upon Steven L. Woodward, Defendant, via

¹ Plaintiff notes that Defendant filed the same frivolous motion under two different headings. The Court has ample authority under Fed. R. Civ. P. 12(f) to strike redundant matters from the record.

his email address Steve_L_woodward@yahoo.com and First Class U.S. mail to Steven Woodward, c/o 7211 Brittwood Lane, Flint, MI 48507 on May 4, 2011.

/s/ Eric A. Buikema
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**BRIEF IN SUPPORT OF PLAINTIFF'S RESPONSE TO "DEFENSE
RESPONSE TO ORDER REQUIRING RESPONSE TO DEFENDANT'S
MOTION TO COMPEL" (DOCKET NO.1 35)**

Plaintiff relies on its response and Fed. R. Civ. P. 72 in support of its response.

Respectfully submitted,

/s/ Eric A. Buikema (P58379)
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